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Attorneys for Defendant Vincent Lorenz

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Louis Marks,

Plaintiff,

v.

State of Nevada, *et al.*,

Defendants.

Case No. 2:18-cv-01421-RFB-BNW

**DEFENDANT'S MOTION TO EXTEND
TIME TO SUBMIT A MEDIATION
STATEMENT**

Defendant Vincent Lorenz, by and through counsel, Aaron D. Ford, Attorney General for the State of Nevada, and Henry H. Kim, Deputy Attorney General, hereby files this Motion to Extend Time to submit a mediation statement.

I. INTRODUCTION

On July 30, 2020, this Court issued an Order setting an inmate early mediation conference on September 25, 2020. ECF No. 16 at 1:15-6. Ordinarily, mediation statements are due one week before the mediation conference. However, this Court ordered that the mediation statements be submitted to the Court by 4:00 p.m. on Friday, August 18, 2020.

II. APPLICABLE LAW

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

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When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Any request to change deadlines established in the scheduling order must be supported by a showing of good cause pursuant to Fed. R. Civ. P. 16(b)(4), which turns primarily on a showing that the deadlines currently in place could not reasonably be met despite the diligent of the movant. *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992).

III. ARGUMENT

Lorenz respectfully requests that this Court grant a 30-day extension on the deadline to submit a mediation statement. The undersigned has a mediation statement in another matter due on August 18, 2020, with the mediation conference set on August 25, 2020. Additionally, the undersigned is working remotely due to the pandemic and has limited access to the office data and resources. A 30-day extension would afford the undersigned and Lorenz an opportunity to submit a more thorough and meaningful mediation statement.

IV. CONCLUSION

For the foregoing reasons, Defendant Lorenz respectfully requests that this Court grant a 30-day extension on the deadline to submit a mediation statement.

DATED this 7th day of August, 2020.

Respectfully submitted,

IT IS SO ORDERED

AARON D. FORD
Attorney General

DATED: August 11, 2020

By: /s/ Henry H. Kim
HENRY H. KIM (Bar No. 14390)
Deputy Attorney General



Attorneys for Defendant Vincent Lorenz

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on August 7, 2020, I electronically filed the foregoing **DEFENDANT'S MOTION TO EXTEND TIME TO SUBMIT A MEDIATION STATEMENT**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by emailing a copy to the following:

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Plaintiff, Pro Se

/s/ Sheri Regalado

Sheri Regalado, an employee of the
Office of the Nevada Attorney General